UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
3:20-cv-137

ANITA MOSS, ON BEHALF OF HERSELF   )
AND OTHERS SIMILARLY SITUATED,   )
)
      Plaintiff   )
)
v.   )
)
SENIOR CARE CAROLINAS, PLLC,   )
INNOVATIVE HEALTHCARE   )
MANAGEMENT, LLC and MELISSA   )
LYNCH,   )
)
      Defendants   )
)

**DEFENDANTS' MOTION FOR
EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO
PLAINTIFF'S COMPLAINT**

NOW COMES the Defendants Senior Care Carolinas, PLLC, Innovative Healthcare

Management, LLC and Melissa Lynch, acting by and through their attorneys, Cranfill Sumner &

Hartzog, LLP, and respectfully shows unto the Court that these Defendants were served with the

Summons and Complaint on or about March 18, 2020; and that additional time is needed for

investigation and preparation of a response in the above case.

Therefore, these Defendants respectfully move the Court for an additional twenty-one

(21) day extension of time, within which to serve answer or otherwise respond.

This the 24th day of March, 2020.

CRANFILL SUMNER & HARTZOG LLP

BY: /s/ Ryan D. Bolick
        Ryan D. Bolick, NC Bar #26482
        Attorney for Defendants
        P.O. Box 30787
        Charlotte, NC 28230
        Telephone (704) 332-8300
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        rbolick@cshlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing DEFENDANTS' MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT with the Clerk of Court using the CM/ECF system which will send notification of such filing to the attorney of record referenced below:

L. Michelle Gessner
GESSNERLAW, PLLC
602 East Morehead Street
Charlotte, NC 28202
Email: michelle@mgessnerlaw.com

This the 24th day of March, 2020.

CRANFILL SUMNER & HARTZOG LLP

BY: _____/s/ Ryan D. Bolick_____
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